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USDOC FOR 532/OEA/LHINES/ADYSON  
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR WILLIAM ZARIT  
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS

SIPDIS

E.O. 12958: N/A

TAGS: [BMGT](#) [BEXP](#) [HK](#) [ETRD](#) [ETTC](#)

SUBJECT: EXTRANCHECK: POST SHIPMENT VERIFICATION: BOSCH SECURITY  
SYSTEMS LTD

REF: A) USDOC 03399

1.Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

12. As per reftel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Export Control Officer Philip Ankel (ECO) attempted to conduct post shipment-verifications (PSV) at Bosch Security Systems Ltd., 12/F Metropole Square, 2 On Yiu Street Shatin, Hong Kong (Bosch). The items in question are 1000 semiconductors exported to Bosch on or about March 31, 2006 and valued at USD 20,790. On the applicable shippers export declaration (SED), these items are classified as EAR99 and, if properly classified, can be exported/reexported to virtually all destinations and end-users (except certain sanctioned countries and restricted end-users/uses). The exporter was Rochester Electronics of Newburyport, Massachusetts.

13. According to the Hong Kong Companies Registry, Bosch has been in existence since 1994. Its paid up share capital is the Hong Kong equivalent of USD 300,000. U.S. nationals Eric Behlke George and Christopher Paul Gerace and German national Uwe Glock are listed as directors. Bosch in Hong Kong is part of the Bosch Group, an international global supplier of automotive and industrial technology, consumer goods and building technology. The Group has more than 270,000 employees. Bosch in Hong Kong provides a range of products in the security field including intrusion systems, motion detectors and fire alarms as well as analog and digital video systems and components ([www.boschsecurity.com.hk](http://www.boschsecurity.com.hk)).

14. Commercial Assistant Carrie Chan attempted for some time to arrange a time to conduct the PSV. Eventually, Ms. Chan was able to speak with Mr. Jack Watt at Bosch who explained that the Bosch Hong Kong operation is now only a sales office and it does not have information about past shipments (that came through Bosch when the Hong Kong operation still handled logistics matters for the Bosch China operation). Since the time of the shipment in question, Bosch has outsourced its logistics operations in Hong Kong to DHL.

15. Steven Wong of DHL was able to locate and provide to ECO copies of documentation regarding the shipment in question. That documentation confirmed that the items in question had been received by Bosch's warehouse in Hong Kong. According to Mr. Wong, the documents confirming subsequent reexport to mainland China for use in Bosch's manufacturing process were lost when Bosch's logistics operations were outsourced to DHL. ECO finds Mr. Wong's explanation to be credible.

16. At the time visited, Bosch appeared to be a suitable recipient of the subject commodities as it cooperated with the PSV and is involved in production of various products that likely make use of electronic components such as the ones that were the subject of this PSV.